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erroneously named as Hopwell
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Attorneys for Plaintiff
MIGUEL VALENCIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MIGUEL VALENCIA

Plaintiff,

vs.

HYUNDAI MERCHANT MARINE
COMPANY, LTD., HOPWELL
NAVIGATION, INC. and DOES 1-20,

Defendants.

Case No.: C 05 02371 JCS

**STIPULATION FOR ORDER SETTING
DEFENDANT HOPEWELL
NAVIGATION INC.'S MOTION FOR
ORDER TO CONTINUE PRETRIAL
DEADLINES AND TRIAL DATE ON
SHORTENED TIME; AND**

DECLARATION OF ANDREW I. PORT

WHEREAS Defendant Hopewell Navigation Inc. ("Hopewell") has filed a Motion to
Continue Trial Date and Pretrial Deadlines in the referenced matter;

WHEREAS the Motion is currently set for hearing on December 22, 2006;

1 WHEREAS the current date for pretrial filings is December 1, 2006;

2 WHEREAS the trial date is currently scheduled for January 16, 2007; and,

3 WHEREAS the parties agree that Hopewell's motion should be heard prior to the pretrial
4 submission date;

5 IT IS HEREBY STIPULATED by and between the parties, through their respective
6 counsel of record, and subject to the Court's approval, that Hopewell Navigation Inc.'s Motion
7 for an Order Continuing Pretrial Deadlines and Trial Date shall be heard on November 22, 2006,
8 at 9:30 a.m. in the courtroom of the Honorable Magistrate Judge Joseph C. Spero.

9 Plaintiff will not oppose Hopewell's Motion to Continue the Trial Date.

10 The parties further stipulate to the following abbreviated briefing schedule, subject to the
11 Court's approval:

12 Opposition brief to be filed no later than November 17, 2006.

13 Any reply brief to be filed no later than November 20, 2006.

14 In accordance with Local Rule 6-2, the supporting the Declaration of Andrew I. Port is
15 attached hereto as Exhibit A.

16 Dated: November 15, 2006

EMARD DANOFF PORT TAMULSKI &
PAETZOLD LLP

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19 By /s/ Andrew I. Port
Andrew I. Port
Katharine Essick
20 Attorneys for Defendant
HOPEWELL NAVIGATION INC.
21

22 Dated: November 15, 2006

WELTIN LAW OFFICE

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24 By /s/ Patrick B. Streb
Patrick B. Streb
25 Attorneys for Plaintiff
MIGUEL VALENCIA
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Certification of Signatures

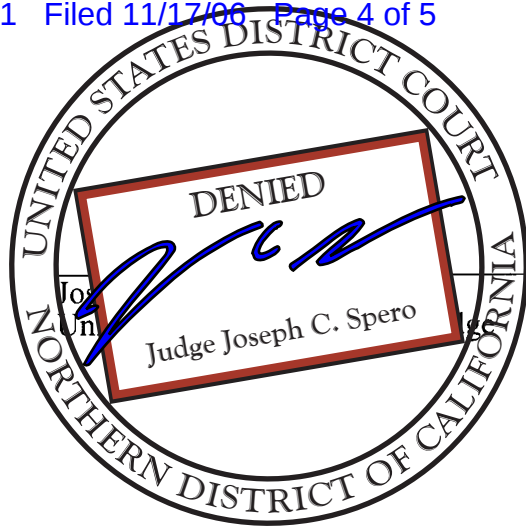
I attest that the content of this document is acceptable to all persons above, who were required to sign it.

/s/ Andrew I. Port

Andrew I. Port

IT IS SO ORDERED.

Date: November 16, 2006



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EXHIBIT A

DECLARATION OF ANDREW I. PORT

I, Andrew I. Port, declare as follows:

1. I am a member of the State Bar of California and am admitted to practice before this Court. I am counsel of record for Hopewell Navigation Inc., the defendant herein. I make this declaration of personal first-hand knowledge and if called to testify as to the contents hereof, I could and would competently do so.

2. Hopewell has filed a Motion to Continue Trial Date and Pretrial Deadlines. In accordance with Local Rule 7-2(a), Hopewell's Motion is currently scheduled for hearing on December 22, 2006.

3. The discovery cutoff in this case was November 1, 2006. The parties have been cooperating regarding depositions that had been scheduled, but could not be completed by that date.

4. The parties agree that Hopewell's motion should be heard prior to the pretrial submission date, subject to the Court's availability.

5. The parties have previously filed a stipulation to extend the pretrial submission filing date to December 1, 2006, so that the parties (before filing those documents) could comply with this Court's order mandating a second mediation session by December 1st. (Mediation is scheduled for November 28, 2006.)

6. Permitting Hopewell Navigation Inc.'s Motion to be heard on an expedited hearing schedule will not otherwise affect the schedule for this case.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on November 15, 2006, at San Francisco, California.

/s/ Andrew I. Port
ANDREW I. PORT